

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

<p>Council 37, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:12-CV-0046 (MAD)(DRH)</p>
<p>Council 82, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:11-CV-1525 (MAD)(DRH)</p>
<p>CSEA, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:11-CV-1530 (MAD)(DRH)</p>
<p>NYSCOPBA, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:11-CV-1523 (MAD)(DRH)</p>

<p>NYSP PBA, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:11-CV-1526 (MAD)(DRH)</p>
<p>NYSPIA, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:11-CV-1527 (MAD)(DRH)</p>
<p>PBA of New York State, Inc., <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:11-CV-1528 (MAD)(DRH)</p>
<p>PEF, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:11-CV-1533 (MAD)(DRH)</p>
<p>NYSCOA, <i>et al.</i>,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">-against-</p> <p>The State of New York, <i>et al.</i>,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>1:12-CV-0532 (MAD)(CFH)</p>

UUP, <i>et al.</i> ,	
<i>Plaintiffs,</i>	1:11-CV-1529
-against-	(MAD)(DRH)
The State of New York, <i>et al.</i> ,	
<i>Defendants.</i>	

**NOTICE OF DEFENDANTS'  
MOTION FOR RECONSIDERATION**

**ERIC T. SCHNEIDERMAN**

Attorney General of the State of New York  
Attorney for Defendants  
The Capitol  
Albany, New York 12224-0341

By: Charles J. Quackenbush  
BRN 601683  
Assistant Attorney General, Of Counsel  
(518) 402-2270  
[charles.quackenbush@ag.ny.gov](mailto:charles.quackenbush@ag.ny.gov)

Kevin P. Hickey  
BRN 509796  
Assistant Attorney General, Of Counsel  
(518) 474-4367  
[kevin.hickey@ag.ny.gov](mailto:kevin.hickey@ag.ny.gov)

PLEASE TAKE NOTICE that upon the plaintiffs' Complaints/Amended Complaints, defendants' Memorandum, the Rule 12(b) Decisions/Orders of this Court issued on December 5, 2012, the Declaration of AAG Charles Quackenbush with an annexed copy of *RPEA v. Cuomo, et al*, 2012 N.Y. Misc. LEXIS 5714 (Albany Sup. 12/17/12) and upon all prior proceedings, the New York State defendants on **Tuesday, March 19, 2013 at 10:00 a.m.** will make a Motion for Reconsideration under Fed. R. Civ. P. Rule 60 at the United States District Court, Northern District of New York, Albany, N.Y. before the Honorable United States District Judge Mae A. D'Agostino, by which the defendants will seek an Order dismissing the remainder of plaintiffs' actions pursuant to Rules 12(b)(1) and 12(b)(6).

Dated: Albany, New York  
February 7, 2013

**ERIC T. SCHNEIDERMAN**  
Attorney General of the State of New York  
Attorney for New York State defendants  
Office of the Attorney General  
The Capitol  
Albany, New York 12224

By: s\Charles J. Quackenbush  
Charles J. Quackenbush  
Assistant Attorney General, of Counsel  
BRN 601683  
(518) 402-2270  
[charles.quackenbush@ag.ny.gov](mailto:charles.quackenbush@ag.ny.gov)

**To:**

Jeffrey P. Mans, Esq.  
Sheehan, Greene Law Firm  
Counsel for plaintiffs in *NYSCOPBA*  
54 State Street, Suite 1001  
Albany, NY 12207

Christine A. Caputo Granich, Esq.  
New York State Law Enforcement Officers  
Union, District 82  
Counsel for plaintiffs in *Council 82*  
63 Colvin Avenue  
Albany, NY 12206

Stephen G. DeNigris, Esq.  
Office of Stephen G. DeNigris  
Counsel for plaintiffs in *NYSP PBA*  
2100 M Street, N.W.  
Suite 170-283  
Washington, DC  
20037-1233

Mark T. Walsh, Esq.  
Gleason, Dunn Law Firm  
Counsel for plaintiffs in *NYSPIA*  
40 Beaver Street  
Albany, NY 12207

Richard C. Reilly, Esq.  
Gleason, Dunn Law Firm  
Counsel for plaintiffs in *PBA*  
40 Beaver Street  
Albany, NY 12207

Harold Eisenstein, Esq.  
Robert T. Reilly, Jr., Esq.  
NYSUT - Latham Office  
Counsel for plaintiffs in *UUP*  
800 Troy-Schenectady Road  
Latham, NY 12110-2455

Paul S. Bamberger, Esq.  
Civil Service Employees Association, Inc.  
Counsel for plaintiffs in *CSEA*  
143 Washington Avenue  
P.O. Box 7125, Capitol Station  
Albany, NY 12224

Lisa M. King, Esq.  
Rita Strauss, Esq.  
John F. Kershko, Esq.  
Public Employees Federation, AFL-CIO  
Office of General Counsel  
Counsel for plaintiffs in *PEF*  
1168-70 Troy-Schenectady Road  
Albany, NY 12110

Erica C. Gray-Nelson, Esq.  
District Council 37  
Counsel for plaintiffs in *Council 37*  
125 Barclay Street  
New York, NY 10007

Amer Pharaon, Esq.  
James E. Tyrrell, Jr., Esq.  
Patton, Boggs Law Firm - NJ Office  
Counsel for plaintiffs in *NYSCOA*  
One Riverfront Plaza  
Newark, NJ 07102